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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

RICHARD KLEIN, RAYMOND URIAS, and
SARA J. GUNTER, individually and on behalf
of all others similarly situated,

Plaintiffs,

v.

NATIONAL COLLEGIATE STUDENT
LOAN TRUST 2005-3; NATIONAL
COLLEGIATE STUDENT LOAN TRUST
2006-3; NATIONAL COLLEGIATE
STUDENT LOAN TRUST 2007-1;
NATIONAL COLLEGIATE STUDENT
LOAN TRUST 2007-2; NATIONAL
COLLEGIATE STUDENT LOAN TRUST
2007-3; NATIONAL COLLEGIATE
STUDENT LOAN TRUST 2007-4;
PENNSYLVANIA HIGH EDUCATION
ASSISTANCE AGENCY d/b/a AMERICAN
EDUCATION SERVICES; and
TRANSWORLD SYSTEMS, INC.,

Defendants.

Case No. 2:22-cv-01392-GMN-BNW

**STIPULATION AND ORDER
EXTENDING DEADLINE TO FILE
REPLY MEMORANDUM IN SUPPORT
OF AES' MOTION TO DISMISS**

(Second Request)

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STIPULATION

Plaintiffs Richard Klein, Raymond Urias, and Sara J. Gunter (“Plaintiffs”), and Defendant American Education Services, LLC (“AES”), by and through their undersigned counsel, hereby jointly stipulate, agree, and move as follows:

1. On March 13, 2023, AES filed and served their Motion to Dismiss Amended Complaint (the “Motion”). ECF No. 42.

2. On April 10, 2023, Plaintiffs served their opposition to the Motion. ECF No. 52.

3. Pursuant to LR 7-2, AES's reply memorandum is due to be filed on April 17, 2023.

4. Counsel for AES traveled to Great Lakes, Illinois during the week of April 10, 2023,

4. Counsel for AES traveled to Great Lakes, Illinois during the week of April 10, 2023, to attend his son's graduation from U.S. Navy Recruit Training Command at Great Lakes Naval Base.

5. Accordingly, this Court granted a previous stipulation to extend to April 24, 2023 the deadline for AES to prepare and file the reply memorandum in support of the Motion.

6. Additional time is needed for AES to review and approve the draft reply memorandum in support of the Motion before it is filed.

7. The Parties have agreed that AES shall have up to and including May 1, 2023, to file its reply memorandum in support of its Motion.

8. This is the second requested extension by AES for this filing, which will neither prejudice any party nor unreasonably delay the litigation.

IT IS SO STIPULATED.

DATED this 24th day of April, 2023.

DATED this 24th day of April, 2023.

/s/ Patrick J. Reilly

Patrick J. Reilly, Esq.

Monique S. Jammer, Esq.

BROWNSTEIN HYATT FARBER SCHRECK, LLP

Attorneys for American Education Services, LLC

/s/ George Haines

Scott C. Harris, Esq.

George Haines, Esq.

Gerardo Avalos, Esq.

FREEDOM LAW FIRM

Attorneys for Plaintiffs and the Class

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ORDER

Pursuant to the foregoing Joint Stipulated Motion, and with good cause and excusable neglect appearing, **IT IS HEREBY ORDERED** as follows:

AES shall have up to and including May 1, 2023 to file its reply memorandum in support of its Motion to Dismiss Amended Complaint (ECF No. 42).

IT IS SO ORDERED.

UNITED STATES DISTRICT JUDGE

Dated: April 24, 2023

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